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L.P.; and BESTBUY.COM, L.L.C.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
MDL No. 1917

This Document Relates to:

In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates to:

All Indirect Purchaser Actions

*Best Buy Co., Inc., et al. v. Hitachi, Ltd., et
al., No. 11-cv-05513-SC*

*Best Buy Co., Inc., et al. v. Technicolor SA, et
al., No. 13-cv-05264-SC*

*Target Corp. v. Chunghwa Pictures Tubes,
Ltd., et al., No. 3:07-cv-05514-SC*

**DECLARATION OF LAURA E.
NELSON IN SUPPORT OF
PLAINTIFFS' RESPONSE IN
OPPOSITION TO DEFENDANTS'
JOINT MOTION IN LIMINE TO
EXCLUDE IMPROPER
CHARACTERIZATIONS OF OR
REFERENCES TO DEFENDANTS AND
ALLEGED CO-CONSPIRATORS**

[DEFENDANTS' MIL NO. 6]

Date: TBD
Time: TBD
Place: Courtroom 1
Hon. Samuel Conti

Target Corp. v. Technicolor SA, et al., Case No. 3:11-cv-05514-SC

Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et al., No. 11-cv-05502-SC

Sears, Roebuck and Co., et. al. v. Chunghwa Picture Tubes, Ltd., et al., No. 11-cv-5514

Sharp Electronics Corporation, et al. v. Hitachi, Ltd., et al., No. 13-cv-01173-SC

Sharp Electronics Corp., et al. v. Koninklijke Philips Electronics N.V., et al., No. 13-cv-2776 SC

ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., et al., No. 14-cv-02510

I, Laura E. Nelson, declare as follows:

1. I am an attorney at Robins Kaplan LLP and counsel of record for Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; and BESTBUY.COM, L.L.C.. I submit this Declaration in support of Plaintiffs' Response in Opposition to Defendants' Joint Motion in Limine to Exclude Improper Characterizations of or Reference to Defendants and Alleged Co-Conspirators ("Response to Motion in Limine").

2. Attached hereto as **Exhibit 1** is a true and correct copy of Samsung SDI's Amended Plea Agreement in United States v. Samsung SDI Co., Ltd., Case No. 3:11-CR-00162-WHA, Dkt. No. 40-1 (N.D. Cal. Aug. 8, 2011).

3. Attached hereto as **Exhibit 2** is a true and correct copy of a Transcript of the Change of Plea Hearing in United States v. Samsung SDI Co., Case No. 3:11-CR-00162-WHA, Dkt. No. 40-1 (N.D. Cal. May 24, 2011).

4. Attached hereto as **Exhibit 3** is a true and correct copy of the "Summary of Commission Decision," relating to European Commission's December 5, 2012 Decision in Case COMP/39.437, published in European Commission's Official Journal of the European Union on October 19, 2013.

5. Attached hereto as **Exhibit 4** is a true and correct copy of the April 15, 2014 Expert Report of Stephan Haggard.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Chad Albrecht's article entitled "The relationship between South Korean chaebols and fraud" and published in the Journal of Management Research Review in 2010 (at Vol. 33(3)).

7. Attached hereto as **Exhibit 6** is a copy of Jae-Seung Baek's article entitled "Corporate governance and firm value: evidence from Korean financial crisis" and published in the Journal of Financial Economics in 2004 (at Vol. 71).

8. Attached hereto as **Exhibit 7** is a true and correct copy of T.L. Campbell & P.Y. Keys' article "Corporate governance in South Korea: the chaebol experience" published in the Journal of Corporate Finance in 2002 (at Vol. 8(4)).

9. Attached hereto as **Exhibit 8** is a true and correct copy of Jongmoo Jay Choi's article "The Value of Outside Directors: Evidence from Corporate Governance Reform in Korea" published in the Journal of Financial & Quantitative Analysis in 2007 (at Vol. 42).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 27, 2015 in Minneapolis, Minnesota

s/Laura E. Nelson

Laura E. Nelson